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13 *Attorney for Plaintiff, U.S. Bank, National Association, Successor Trustee To Bank Of America,*
14 *N.A., As Successor Trustee To LaSalle Bank, N.A, As Trustee For The Holders Of The First*
15 *Franklin Mortgage Loan Trust, Mortgage Loan Asset-Backed Certificates, Series 2007-FF1*

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 U.S. BANK, NATIONAL ASSOCIATION,
19 SUCCESSOR TRUSTEE TO BANK OF
20 AMERICA, N.A., AS SUCCESSOR
21 TRUSTEE TO LASALLE BANK, N.A, AS
22 TRUSTEE FOR THE HOLDERS OF THE
23 FIRST FRANKLIN MORTGAGE LOAN
24 TRUST, MORTGAGE LOAN ASSET-
25 BACKED CERTIFICATES, SERIES 2007-
26 FF1,

27 Plaintiff,

28 vs.

FIDELITY NATIONAL TITLE
INSURANCE COMPANY and LAWYERS
TITLE INSURANCE CORPORATION,

Defendants.

Case No.: 2:19-cv-00809-GMN-BNW

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO DISMISS
[ECF NO. 53]**

(Second Request)

23 COMES NOW, Plaintiff, U.S. Bank, National Association, Successor Trustee To Bank
24 Of America, N.A., As Successor Trustee To LaSalle Bank, N.A, As Trustee For The Holders Of
25 The First Franklin Mortgage Loan Trust, Mortgage Loan Asset-Backed Certificates, Series 2007-
26 FF1 (“US Bank”) and Defendant, Fidelity National Title Insurance Company (“Fidelity”), by and
27 through their respective undersigned counsels, stipulate and agree as follows:

28 1. On March 12, 2024, Fidelity filed a Motion to Dismiss [ECF Nos. 53];

2. US Bank's deadline to respond to Fidelity's Motion to Dismiss is currently April 9, 2024 following an initial extension granted by this Court [ECF No. 57];
3. Since the initial extension, on April 4, 2024, the Ninth Circuit Court of Appeals issued a memorandum decision in *Wells Fargo Bank, N.A. v. Commonwealth Land Title Insurance Company*, Ninth Cir. Case No. 19-16181 (District Court Case No. 2:18-CV-00494-APG-BNW) ("*Wells Fargo*"). US Bank requires additional time to assess any potential impact of *Wells Fargo* on this matter;
4. Accordingly, good cause exists to grant a one-week extension up to and including April 16, 2024 for US Bank to file its response to Fidelity's Motion to Dismiss;
5. Counsel for Fidelity does not oppose the requested extension;
6. This is the second request for an extension and is made in good faith and not for purposes of undue delay or prejudice.

IT IS SO STIPULATED.

DATED this 9th day of April, 2024.

WRIGHT, FINLAY & ZAK, LLP

/s/ Yanxiong Li, Esq.

Yanxiong Li, Esq.

Nevada Bar No. 12807

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Attorneys for Plaintiff

DATED this 9th day of April, 2024.

SINCLAIR BRAUN KARGER LLP

/s/ Kevin S. Sinclair, Esq.

Kevin S. Sinclair, Esq.

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Attorneys for Defendant

IT IS SO ORDERED.

DATED: April 9, 2024


DISTRICT COURT JUDGE